

Raymond Ragues, Esq.  
RAGUES PLLC  
Attorneys for Debtor/Defendant  
33 West 19<sup>th</sup> Street, 4<sup>th</sup> Floor  
New York, New York 10011  
(212) 766-1100

Presentment Date: February 18, 2016  
Presentment Time: 2:00 pm

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re: : Chapter 7  
: Case No. 14-45313-CEC  
REHAN REHMAN,

:  
Debtor.

-----X

HILAL AISSANI, : Adv. Pro. No 15-1009-CEC

Plaintiff, :  
- Against - :  
REHAN REHMAN, :  
Defendant :  
-----X

NOTICE OF PRESENTMENT AND OPPORTUNITY FOR HEARING

PLEASE TAKE NOTICE that the undersigned will present the attached proposed order to Hon. Carla E. Craig, United States Bankruptcy Chief Judge, for signature on February 18, 2016 at U.S. Bankruptcy Court, 271-C Cadman Plaza East – Suite 1595, Brooklyn, New York 11201-1800.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the Proposed Order with proof of service, is filed with the Clerk of the Court electronically at [www.nyeb.uscourts.gov](http://www.nyeb.uscourts.gov) and a courtesy copy is delivered to (1) Judge Craig, located at the U.S. Bankruptcy Court, Martin Luther King, Jr. Federal Building, 271-C Cadman Plaza, East – Suite 1595, Brooklyn, New York 11201-1800, (2) the undersigned, and (3) the U.S. Trustee's Office at 271 Cadman Plaza East, Suite 4529, Brooklyn, New York, no later than February 11, 2016, Judge Craig may sign the order without conducting a hearing on the motion.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing. The objecting parties are required to attend the hearing; failure to attend in person or by counsel may result in the relief being granted or denied upon default.

Dated: New York, New York  
January 21, 2016

/s/  
Raymond Ragues  
Ragues PLLC  
Attorneys for Debtor/Defendant  
33 West 19<sup>th</sup> Street, 4<sup>th</sup> Floor  
New York, New York 10011

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HILAL AISSANI, : Adv. Pro. No 15-1009-CEC

Plaintiff, :  
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- Against - :  
-----X

REHAN REHMAN, :  
-----X

Defendant :  
-----X

**APPLICATION OF RAGUES PLLC TO WITHDRAW  
AS COUNSEL TO REHAN REHMAN**

Ragues PLLC, counsel of record to REHAN REHMAN, hereby states, in support of its application to withdraw as counsel as follows:

1. Ragues PLLC filed a voluntary petition on behalf of REHAN REHMAN in the above -captioned chapter 7 case on October 22, 2014.

2. The 341(a) hearing was scheduled for this matter on November 21, 2014 and the initial 341 meeting was held as scheduled. However, the 341(a) hearing was continued and adjourned several times for additional documents. On November 17, 2015, nearly a year later, the debtor and I appeared again for the continuation of his creditor's meeting. Present also was trustee's counsel, Jeffrey Schwartz, and Deborah Kramer, appointed Chapter 7 Trustee in this matter.

3. In the interim, an Adversary Complaint was filed by HILAL AISSANI.

4. Debtor, through counsel served and filed an Answer with Affirmative Defense on June 24, 2015.

5. Hearing on Adversary action was held July 1, 2015 and adjourned.

6. The trial of the adversary action was held and although the defendant-debtor did not appear, his counsel appeared and attended the hearing through its conclusion.

7. The 341 hearing remains adjourned because Debtor has still not been able to provide documents the Trustee requested.

8. I have been unable to obtain the debtor's cooperation. He has been travelling extensively outside the jurisdiction of the court, nationally and internationally, always assuring that the documents would be forthcoming but has failed to do so.

9. In addition, the debtor has been demanding that I amend schedules to include post petition debt and has withheld payments to our office because of our refusal to comply with his wishes.

10. Because of Debtor's failure and/or refusal to provide documents/information Trustee requested in compliance, the undersigned cannot effectively represent the Debtor in his Chapter 7 case or defend him in any further adversary actions.

11. Moreover, Ragues PLLC informed Debtor on numerous times that Ragues PLLC will withdraw as counsel for the Debtor/Defendant unless he provided all outstanding documents and brought his account current. He has done neither..

**RELIEF REQUESTED**

12. Ragues PLLC hereby requests the entry on an order permitting it to withdraw as counsel. A declaration of the undersigned supporting this request is attached hereto.

13. By refusing and failing to communicate and provide required documents to this office in connection with the above captioned case, among other things, Ragues PLLC has been effectively discharged by REHAN REHMAN. As such, Ragues PLLC is required to seek the Court's permission to withdraw as counsel.

14. Ragueus PLLC mailed a copy of Notice of this application to REHAN REHMAN.

WHEREFORE, Ragues PLLC requests that the Court grant the relief requested herein, and grant such other and further relief as deemed just.

Dated: New York, New York  
January 21, 2016

\_\_\_\_\_  
/s/  
Raymond Ragues  
Ragues PLLC  
Attorneys for Debtor/Defendant  
33 West 19<sup>th</sup> Street, 4<sup>th</sup> Floor  
New York, NY 10011

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UNITED STATES BANKRUPTCY COURT  
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: Debtor. :  
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HILAL AISSANI, : Adv. Pro. No 15-1009-CEC  
: Plaintiff, :  
- Against - :  
REHAN REHMAN, :  
: Defendant :  
----- X

DECLARATION OF RAYMOND RAGUES  
IN SUPPORT OF APPLICATION TO WITHDRAW  
AS COUNSEL TO REHAN REHMAN

Raymond Ragues, hereby declares as follows:

1. Ragues PLLC filed a voluntary petition on behalf of REHAN REHMAN in the above -captioned chapter 7 case on October 22, 2014.
2. The 341(a) hearing was scheduled for this matter on November 21, 2014 and initial 341 meeting was held as scheduled. However, the 341(a) hearing has been continued and adjourned several times for additional documents. On November 17, 2015 the debtor and I

appeared again for the continuation of his creditor's meeting. Present also was trustee's counsel, Jeffrey Schwartz, and Deborah Kramer, appointed Chapter 7 Trustee in this matter.

3. An Adversary Complaint was filed by HILAL AISSANI on or about January 20, 2015.

4. Debtor served and filed Answer with Affirmative Defense on June 24, 2015.

5. Hearing on Adversary action was held July 1, 2015 and adjourned.

6. The trial of the adversary action was held and although the defendant-debtor did not appear, I appeared and attended the hearing through its conclusion.

7. The 341 hearing is still adjourned because Debtor has not been able to provide documents the Trustee requested..

8. I have been unable to obtain the debtor's cooperation. He has been travelling extensively outside the jurisdiction of the court, nationally and internationally, always assuring that the documents would be forthcoming but has failed to do so.

9. In addition, the debtor has been demanding that I amend schedules to include post petition debt and has withheld payments to our office because of our refusal to comply with his wishes.

10. Because of Debtor's failure and/or refusal to provide documents/information the Trustee requested, the undersigned cannot effectively represent the Debtor in his Chapter 7 case or defend him in any further adversary actions.

11. Moreover, Ragues PLLC informed Debtor on numerous times that Ragues PLLC will withdraw as counsel for the Debtor/Defendant unless he provided all outstanding documents and brought his account current. He has done neither.

12. I hereby requests the entry of an order permitting me to withdraw as counsel.

13. By refusing and/or failing to provide required documents to this office in connection with the above captioned case, among other things, Ragues PLLC has been effectively discharged by REHAN REHMAN. As such, Ragues PLLC is required to seek the Court's permission to withdraw as counsel.

I declare, under the penalty of perjury, that the foregoing is accurate and true.

Dated: New York, New York  
January 21, 2016

/s/  
Raymond Ragues  
Ragues PLLC  
Attorneys for Debtor/Defendant  
33 West 19<sup>th</sup> Street, 4<sup>th</sup> Floor  
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